

AFFIDAVIT FOR SEARCH WARRANTS

I, David Middleton, having been duly sworn, hereby depose and state as follows:

INTRODUCTION AND DETECTIVE BACKGROUND

1. I make this affidavit in support of applications under Rule 41 of the Federal Rules of Criminal Procedure for search warrants authorizing the examination of electronic devices seized from **Sean J. HILL** (hereinafter "**HILL**") and **Patricia A. KING** (hereinafter "**KING**") during their arrests on March 2, 2023, and the extraction from that property of electronically stored information further described in Attachment B.

2. I am a Detective with the Kansas City, Missouri, Police Department ("KCMOPD"). I am assigned as a Detective with the Drug Trafficking Squad ("DTS") under the Special Investigations Division (SID). I have been assigned in this capacity since May 2020. I was previously assigned to the Street Crime Unit (SCU) of the KCPD from March of 2018 to May 2020. I have been employed with the Kansas City, Missouri Police Department since January of 2014.

3. During my previous assignment with SCU and my current assignment with DTS, I participated in numerous investigations of individuals who had violated both state and federal controlled substance laws.

4. Based on my training and experience, I am familiar with how controlled substances are manufactured, obtained, diluted, packaged, distributed, sold, and used. Further, I know that individuals who deal in illegal controlled substances commonly maintain addresses or telephone numbers in mobile telephones, utilizing the internal mobile phone electronic storage, which reflects names, addresses and/or telephone numbers for their associates, to include sources of supply, distributors, and customers, in their criminal organizations. In addition to continuing their

illegal businesses, these individuals utilize mobile telephone systems to maintain contact with their criminal associates.

5. Based on my training and experience, I know that individuals engaged in the sale and distribution of illegal controlled substances commonly use numerous mobile telephones and change phone numbers in order to thwart law enforcement investigations. Mobile telephone companies require little or no personal information to activate, thus making it nearly impossible to identify, even through use of subpoenas, the subscribers and their mobile phone numbers. In addition, some mobile telephones on the market today have built in electronic digital cameras and video capabilities. Individuals who deal in illegal controlled substances often take photographs of themselves, their associates, their properties, and their illegal products and merchandise. These individuals usually maintain these photographs and videos in the internal electronic storage of their mobile phones.

IDENTIFICATION OF THE DEVICES TO BE EXAMINED

6. The property to be searched is described in Attachments A1–4 and herein as follows:

- a. A black TCL cellular telephone with IMEI number 016033001912917 imprinted on the phone, and property barcode #P23009710 affixed to it (hereinafter “**Target Device 1**”);
- b. A black SCHOK cellular flip telephone, with property barcode #P23009712 affixed to it (hereinafter “**Target Device 2**”);
- c. A blue ONEPLUS cellular telephone with IMEI 990016801970268 imprinted on the phone, and property barcode #P23009711 affixed to it (hereinafter “**Target Device 3**”); and
- d. An iPhone cellular telephone with a multi-colored case, with property barcode #P23009713 affixed to it (hereinafter “**Target Device 4**”).

7. The foregoing devices are collectively referred to hereinafter as the **Target Devices**.

8. The **Target Devices** were recovered from **Sean J. HILL** (hereinafter “**HILL**”) and **Patricia A. KING** (hereinafter “**KING**”) during their arrests on March 2, 2023. The Target Devices are currently located within the Western District of Missouri.

INVESTIGATION AND PROBABLE CAUSE

9. The United States, including the KCPD, is conducting a criminal investigation of **HILL** and **KING** regarding possible violations of 21 U.S.C. § 841(a)(1), (b)(1)(A) and 846, conspiracy to distribute a controlled substance, 21 U.S.C. § 841(a)(1), (b)(1)(A) and 18 U.S.C. § 2, possession with intent to distribute 500 grams or more of methamphetamine, 21 U.S.C. § 841(a)(1), (b)(1)(C), and 18 U.S.C. § 2, possession with intent to distribute PCP, and 18 U.S.C. §§ 924(c)(1)(A)(i) and 2, possession of firearms in furtherance of a drug trafficking crime. **HILL** is also being investigated for violations of 18 U.S.C. §§ 922(g)(1) and 924(a)(8), felon in possession of firearms.

10. On March 5, 2021, Det. Garcia interdicted a suspicious parcel that was being shipped to 10403 E. 39th Terrace, Kansas City, Missouri 64133. A drug detection canine alerted to the odor of illegal drugs in the parcel. A Jackson County search warrant was obtained, and the parcel was found to contain 4,085.74 grams Phencyclidine (PCP). Later that same day, at 1230 hours, members of the Missouri Western Interdiction and Narcotics (MoWIN) Task Force were in the area of 10403 E. 39th Terrace conducting surveillance for the controlled delivery of the PCP. Kevin Palacios took possession of the parcel. Officers detained Palacios while he was attempting to leave the property. While conducting an on-scene interview, Palacios gave verbal consent to search through two of his cellular phones. Dets. Love and Willingham with the MoWIN Task

Force observed tracking numbers and digital receipts for the parcel that contained the PCP. Det. Willingham observed multiple exchanges with **HILL** indicative of drug trafficking throughout the phones dating back to November 25, 2020. Based on the text messages, it appeared **HILL** was purchasing large amounts of illegal drugs from Palacios. Some of the messages involved amounts in excess of \$1,000.00 per transaction.

11. On October 8, 2021, at 0815 hours, I interdicted a suspicious parcel at the FedEx in Kansas City, Jackson County, Missouri, that was being shipped to “Tyrone Lompote” at 6002 East 100th Terrace, Kansas City, Missouri 64143. My drug detection canine (K-9 Amor) alerted to the odor of illegal drugs on or about the parcel, and a Jackson County search warrant was obtained for it. The parcel was opened, and I observed 5.1 pounds of apparent methamphetamine inside. The substance was tested utilizing a TruNarc device, and it confirmed the substance to be methamphetamine.

12. On October 8, 2021, at approximately 1150 hours, members of the Kansas City, Missouri Drug Trafficking Squad (DTS) and Tactical Support Team (TST) conducted a controlled delivery of the parcel. Det. Garcia, who was working in an undercover capacity with the DTS, delivered the parcel to 6002 East 100th Terrace. A white female answered the front entry door and identified herself as Bonnie J. Eads. Ms. Eads signed for the parcel and stated “Tyrone Lompote” lived at the residence. Ms. Eads was then taken into custody by the TST officers. During the investigation, it was determined Ms. Eads was instructed to sign for the parcel by her boss, Brandi E. NICKENS.

13. Det. Lanaman with the DTS interviewed NICKENS who was inside the residence. Det. Lanaman read NICKENS her Miranda rights and NICKENS stated she understood her rights. Det. Lanaman asked NICKENS if she received packages at the address of 6002 East 100th Terrace,

Kansas City, Missouri, and NICKENS stated, “Yes.” NICKENS stated she had mail sent to the address because she had mail stolen from her personal residence in the past. Det. Lanaman asked if NICKENS had any weapons or narcotics in her vehicle or purse. NICKENS stated she had a pink 9mm handgun in her purse located in her tan 2007 Chevrolet Tahoe that was parked in the driveway. NICKENS gave consent to search her vehicle. Members of DTS conducted a search of the vehicle and located a pink and silver SCCY 9mm semi-automatic handgun, bearing Serial Number 337774. The firearm was located in NICKENS’ purse that was in the back seat. A computer check of the serial number revealed it to be a stolen firearm out of Independence, Missouri. Det. Lanaman asked for consent to search NICKENS’ cellular phone. Det. Lanaman was denied consent to search NICKENS’ phone when he advised he wanted to search the text messages, internet search history, and call log for any evidence regarding the tracking of the FedEx parcel that contained the methamphetamine.

14. On October 13, 2021, at 1631 hours, a Jackson County search warrant was obtained for NICKENS’ black Samsung Galaxy Note 8 that was recovered from 6002 East 100th Terrace, Kansas City, Missouri. The warrant was executed and upon searching through the black Samsung Galaxy Note 8 phone, I observed multiple photographs of the stolen pink handgun that was recovered in NICKENS’ vehicle on October 8, 2021. I also observed multiple photos of an assault rifle and photographs of a black male later identified as **Sean J. HILL** throughout NICKENS’ cellular phone. Det. Mike Wells with DTS examined the videos that had been recovered from the phone during the execution of the search warrant. The following videos were of interest:

- a. A snapchat video, recorded on an unknown date, showed NICKENS sitting on a bed counting U.S. currency. The video was 17 seconds in length and appeared to have been recorded by a male who can be heard narrating the video. The male voice was

consistent with **HILL's** voice. Det. Wells had seen **HILL** in numerous other videos and heard his voice on some of the videos. The male voice referred to NICKENS as "my little accountant". He then scanned the bed with the camera and Det. Wells observed numerous stacks of banded US currency. NICKENS was counting a loose stack of cash. On the bed were approximately twenty-one stacks of banded cash. At least three, possibly four, stacks were \$100 bills, one stack was \$50 bills and the remaining stacks appeared to be \$20 bills. There were also bags of rubber bands on the bed being used to band up the money. There was a blue bag on the bed that had the front pocket unzipped. Inside the bag, Det. Wells was able to see approximately twenty-eight stacks of banded currency. The male voice showed the money and stated, "We ain't doing no fucking around, this is motivation. This is all 50." Based on the number of stacks of banded bills, and the comment, "This is all 50," Det. Wells believed it was approximately \$50,000 in U.S. currency on the bed.

b. A snapchat video, recorded on an unknown date, showed a female wearing latex gloves and holding a box blade. She has a brown box with a UPS shipping label. At one point, Det. Wells can see the label clearly. It was shipped on September 16, 2020, to Greg Belle Jr, 5911 East 100th Street, Kansas City, Missouri. It was an 18-pound box with a tracking number of 1ZY727971511986355. The box was shipped from a UPS store in California. The video was being recorded by a second person with a female's voice. At no time does the video ever show either girl's face. The girls had the parcel outside at night next to a residential AC unit. The female wearing the gloves cut the parcel open from the top. Once in the parcel, they could see that it contained nothing but white shipping popcorn. The two females talked and appeared surprised that there was nothing inside of it.

c. A snapchat video, recorded on an unknown date, showed the same parcel as the one listed above. In this video, the parcel is still outside by an AC unit, however it was recorded during the daytime. It was a seven second video with no talking. The person recording moved the camera to show the top and sides of the parcel.

d. A snapchat video, with a modified date of Friday, July 12, 2019, showed an up-close view of marijuana bud. The video was 15 seconds long and showed the marijuana bud from multiple angles.

e. A video, recorded on October 10, 2020, showed **HILL** holding a black handgun which resembled a Berretta 92X 9mm with the serial number of 92X0023225. A computer check of the serial number revealed it to be stolen out of Blue Springs, Jackson County, Missouri from a business called Hughes Defense Gun Shop on August 9, 2020. I contacted the Blue Springs Police Department, and they advised eleven (11) handguns and rifles had been stolen from the business on the day.

15. The phone was recovered and forwarded to the Kansas City Crime Laboratory as evidence.

16. On January 5, 2022, members of DTS began to conduct surveillance on **NICKENS'** residence located at 6505 NE 54th Street, Kansas City, Clay County, Missouri. At approximately 1300 hours, a burnt orange Dodge Journey pulled into the driveway. **HILL** exited the residence, on his cell phone. He appeared to end his call and looked up and down the street for an extended period of time before he approached the Dodge Journey. **HILL** made contact with the driver of the Journey and engaged in an apparent hand-to-hand deal, consistent with drug dealing. The driver of the Dodge Journey left the neighborhood. A check of the Missouri license plate on the Dodge Journey showed the vehicle was registered to Donna Brandt.

17. Between the dates of January 29, 2022, and February 8, 2022, I observed **HILL** driving a white GMC Yukon bearing Missouri license plate XE9Z2N. On multiple occasions, **HILL** would open the hood of the vehicle and either place an unknown item or retrieve an item from underneath prior to leaving the residence and/or returning home.

18. On February 8, 2022, at 1604 hours, I obtained a Clay County Warrant for a GPS tracker to attach to **HILL**'s 2000 white GMC Yukon bearing Missouri license plate XE9Z2N. The warrant was executed on February 9, 2022, at 1530 hours.

19. Between February 9, 2022, and February 13, 2022, **HILL** was observed conducting hand-to-hand transactions with drivers of various vehicles in the driveway of his residence.

20. During the dates of February 8, 2022, and February 24, 2022, the GPS tracker showed **HILL** would frequent the alleyway between East 24th Street, East 25th Street, Walrond Avenue, and College Avenue, Kansas City, Missouri, almost daily between the hours of 1700-0545. A computer check of the area revealed there to be multiple recent reports of PCP and other drug transactions in the area and alley-ways. During the same dates, the GPS tracker showed **HILL** would frequent Harrah's (One Riverboat Drive, North Kansas City, Missouri), Ameristar (3200 Ameristar Drive, Kansas City, Missouri), and Bally's (1800 E. Front Street, Kansas City, Missouri) casinos almost daily between the hours of 1616-0601. I was unable to locate any reported income for the past two years for **HILL**. It is common for drug traffickers to utilize casinos to try and launder illicit drug proceeds.

21. On February 23 and 24, 2022, it was determined **HILL** stopped driving the white GMC Yukon bearing Missouri license plate XE9Z2N and began to drive a tan GMC Yukon bearing Missouri license plate EJ2R9C. On March 2, 2022, at 1150 hours, I obtained a Clay

County Warrant for a GPS tracker to attach to **HILL's** tan GMC Yukon bearing Missouri license plate EJ2R9C. The warrant was executed on March 3, 2022, at 0815 hours.

22. During the dates of March 3, 2022, and March 9, 2022, the GPS tracker showed **HILL** would frequent the alleyway between East 24th Street, East 25th Street, Walrond Avenue, and College Avenue, Kansas City, Missouri, almost daily between the hours of 1845-2308. During the same dates, the GPS tracker showed **HILL** would frequent Argosy (777 NW Argosy Casino Parkway, Riverside, Missouri), Harrah's, Ameristar, and Bally's casino almost daily between the hours of 1841-0506.

23. On March 1, 2022, at approximately 1205 hours, surveillance detectives observed Brandt pull into the driveway of **HILL's** residence. After several minutes, **HILL** was observed exiting the residence and engaging in an apparent hand-to-hand with Brandt at her Dodge Journey. **HILL** was seen handing Brandt a small, grey colored box. Surveillance crews followed Brandt as she left **HILL's** home and I observed her park at the BP gas station, located at 4632 Paseo, Kansas City, Missouri. Brandt parked and waited for approximately 20-30 minutes until a female arrived in another vehicle and parked in the lot. The unknown female entered the front passenger seat of the Dodge Journey with Brandt. The unknown female was in the Dodge Journey for a brief moment before she exited and returned to her vehicle. The actions observed were consistent with a drug transaction. Detectives followed Brandt as she left the gas station. I requested uniformed officers to move into the area to conduct a car stop on Brandt to investigate the suspicious drug activity. Uniformed officers caught up with Brandt near NW Tullison Road and Riverway Boulevard, Riverside, Missouri. The officers activated their emergency lights and Brandt pulled over and stopped. Officers on scene requested to have a canine conduct a sniff check of the vehicle. I responded to the location and had K-9 Amor conduct an open air sniff of the exterior of the

Dodge Journey. K-9 Amor alerted to the odor of illegal drugs at the driver's door. Due to the K-9 alert, officers conducted a search of the vehicle. Officers stated Brandt's purse was located on the driver's side floorboard and the grey box that I observed **HILL** hand Brandt in his driveway, was located in the back seat, and was empty. Inside the purse were 17.00 grams of methamphetamine, 4.62 grams of marijuana, and 3.00 grams of crack cocaine. A digital scale, with residue, was located in a storage compartment on the driver's side of the center console. The methamphetamine, crack cocaine, and marijuana were all field tested with positive results. At a secure unit in Jackson County, Det. Wells placed the grey box in question with four (4) other unrelated boxes and items. I had K-9 Amor conduct a sniff check of each of the boxes and items. K-9 Amor came into contact with the grey box in question and sat down in front of the box. K-9 Amor then put his nose on the grey box alerting to the odor of controlled substances in or about the box in question.

24. K-9 Amor is a two-year-old German Shepard and is trained and certified to alert to the odor of marijuana, cocaine, methamphetamine, and heroin. K-9 Amor was most recently certified on September 9, 2021, by the National Police Canine Association. Since December 30, 2020, K-9 Amor has assisted in the seizure of 7.25 pounds of cocaine, 16.52 pounds of methamphetamine, 355.31 pounds of marijuana, 4.90 pounds of fentanyl, and \$49,738.00 in U.S. currency.

25. On March 2, 2022, Det. Wells and I interviewed Brandt about her arrest. Brandt waived her *Miranda* rights and admitted to possession of the methamphetamine, crack cocaine, and marijuana. Brandt also admitted she gave marijuana to the female at the BP Gas Station. Brandt claimed she was using all three drugs and admitted she had purchased them on March 1,

2022. Brandt admitted she had drugs in the grey box that was located in the back seat of her vehicle.

26. All of the hand-to-hand transactions between Brandt and **HILL** took place in the driveway of his residence, 6505 NE 54th Street, Kansas City, Missouri. Brandt was never seen exiting her vehicle during any of the transactions at **HILL**'s residence.

27. On March 12, 2022, I received an alert from the GPS tracking device installed on the tan 1998 GMC Yukon, bearing Missouri license plate EJ2R9C. The alert stated it was removed from the vehicle at the location of 6505 NE 54th Street, Kansas City, Missouri. Video surveillance observed **HILL** and a man later identified as Brad L. McGuire working on the tan 1998 GMC Yukon. Due to the device being removed, I decided to arrest **HILL** in regard to the drug investigation.

28. On March 12, 2022, at 2154 hours, Det. Wells obtained a knock and announce, Clay County search warrant for 6505 NE 54th Street, Kansas City, Clay County, Missouri, to search and seize the black GPS tracker, firearms, and ammunition. While searching the residence, detectives observed digital scales with residue, empty vials with a brownish residue that is consistent with Phencyclidine (PCP), and approximately 3.00 lbs. of methamphetamine. At 2322 hours, Det. Wells obtained a search warrant for 6505 NE 54th Street, Kansas City, Clay County, Missouri, to search and seize methamphetamine, phencyclidine, drug paraphernalia, U.S. currency, and a tan GMC Yukon with Missouri license plate EJ2R9C. During the execution of the search warrant, there were six firearms recovered throughout the home in easily accessible locations. A Maverick, model 88, 12 gauge shotgun, bearing Serial Number MV0171778 was recovered from inside the location and a computer check revealed it was stolen out of Kansas City, Missouri.

Approximately 3.00 lbs. of methamphetamine, drug paraphernalia, and multiple live rounds were also recovered throughout the home.

29. On March 15, 2022, at 1140 hours, Det. Love with the MoWIN Task Force obtained a Jackson County search warrant for the tan 1998 GMC Yukon, bearing EJ2R9C, which was located at the Kansas City, Missouri Police Department tow lot, 7750 E. Front Street, Kansas City, Jackson County, Missouri. During the subsequent search of the vehicle, a tan and black Glock, model 43, 9mm pistol, bearing serial number ADNV614 was discovered under the front hood.

30. On December 28, 2022, Sgt. Benson with the Kansas City Police Department Drug Investigations Squad made contact with a confidential source (CS) who had been proven reliable in the past. The CS stated **HILL** sells kilos of methamphetamine, as well as phencyclidine (PCP). He almost always has a gun in his possession when he is out and about. The CS also stated **HILL** keeps his drugs in a lunch box-type container and places his guns and drugs under the hood of his vehicle. The CS stated **HILL** has a stash house located at 4408 Independence Avenue, Apt. #2, Kansas City, Missouri and usually arrives to the location after 2200 hours. The CS stated **HILL** lives with his girlfriend Brandi NICKENS and keeps his cash at **Patricia KING's** residence.

31. On January 5, 2023, I made contact with security at Ameristar Casino in regard to **HILL**. They advised someone using **HILL's** player's card had been gambling at their slot machines on four different days between January 2, 2023, and January 8, 2023. Security advised **HILL** is a regular at their casino and they do not ask for his identification due to him being older than the required age to ask. Security sent me photographs of the person using **HILL's** player's card, and I recognized the individual to be **HILL**. Security advised between January 2, 2023, and January 8, 2023, **HILL** has entered \$5,344.75 in US currency into the slot machines and taken out \$5,263.97. It is common for drug traffickers to utilize casinos to try and launder illicit drug

proceeds. An updated computer check revealed **HILL** continues to not have any reported income over the past three years. Security also advised **HILL** arrived and left the casino driving a grey Nissan Altima bearing Missouri license LJ4C3L. A computer check of the license plate responded back to a “**Patricia King**” at 1301 Topping Avenue, Kansas City, Missouri 64126.

32. On January 12, 2023, at approximately 0650 hours I observed the grey Nissan Altima bearing Missouri license LJ4C3L parked in front of the residence of 4408 Independence Avenue, Kansas City, Missouri. Members of the DTS observed **HILL** exit the south facing most eastern front entry door marked with “#2” carrying a “Crown Royal” bag and approach the Nissan Altima. I observed the brake lights to the Nissan Altima come on and the vehicle leave the residence. The vehicle left the 4408 Independence Avenue, Apt. #2 residence and drove to 1301 Topping Avenue, Kansas City, Missouri 64126. Surveillance detectives observed **HILL** park the vehicle in the driveway, grab a “Crown Royal” bag from underneath the front hood, and approach the front entry door. Detectives observed **HILL** utilize a key to unlock the front entry door and enter the residence. A computer check of the residence revealed **Patricia A. KING** had the water turned on in her name on July 8, 2022.

33. On January 20, 2023, at 1207 hours, I obtained a Federal GPS tracker warrant from the Honorable Jill A. Morris, U.S. Magistrate Judge for the grey 2020 Nissan Altima bearing Missouri license plate LJ4C3L. The warrant was executed on January 27, 2023 at 1120 hours.

34. From February 2, 2023, to February 12, 2023, the GPS device has monitored the grey Nissan Altima parked at various locations in ~~an~~ ~~in~~ Kansas City and Independence, Jackson County and Clay County, Missouri areas. The vehicle generally is parked at the 1301 Topping Avenue residence. The vehicle also frequented 3508 Independence Avenue, Apt. #3, Kansas City,

Jackson County, Missouri. The addresses below indicate when the vehicle has stopped for two minutes or longer during February 2, 2023, to February 12, 2023:

- a. 1301 Topping Avenue, Kansas City, Missouri - 59 times;
- b. 3508 Independence Avenue, Apt. #3, Kansas City, Missouri - 22 times;
- c. Bally's Casino, 1800 E. Front Street, Kansas City, Missouri – 11 times;
- d. 6609 or 6611 E. 18th Street, Kansas City, Missouri – 8 times;
- e. 3330 S. Oxford Avenue, Independence, Missouri – 4 times;
- f. Ameristar Casino, 3200 Ameristar Drive, Kansas City, Missouri – 4 times;
- g. 2014 Lister Avenue, Kansas City, Missouri – 4 times;
- h. 3225 E. 9th Street, Kansas City, Missouri – several times.

35. On numerous occasions, members of the MoWIN Task Force conducted physical surveillance on the grey Nissan Altima bearing Missouri license LJ4C3L and observed it park at 1301 Topping Avenue, Kansas City, Missouri. Detectives observed **HILL** exit the vehicle, open the hood, retrieve a bag from underneath, and enter the front entry door of the residence utilizing a key if the door was locked.

36. On February 8, 2023, at approximately 1200 hours, an investigation was initiated at the 3508 Independence Avenue, Apt. #3, Kansas City, Missouri due to the GPS tracker on **HILL's** vehicle frequently driving to this location. The owner of the building, Mr. Kevin Vavroch, gave the Kansas City Missouri Police Department access to the camera system attached to his property due to him being unhappy with possible drug trafficking in his apartment complex. Mr. Vavroch advised he is ready to evict the tenants from Apartment #3 due to observing drug use and multiple people going in and out of the residence. Mr. Vavroch stated having multiple people who are not on the lease entering and exiting the unit is against the renter's agreement.

37. Det. Wells and I began monitoring the surveillance cameras at the 3508 Independence Avenue, Apt. #3, starting on the date of February 2, 2023, due to the GPS tracker showing **HILL** being parked at the apartment complex. Between the dates of February 2, 2023, and February 13, 2023, the GPS tracked **HILL** leaving 1301 Topping Avenue and driving to 3508 Independence Avenue, Apt. #3. When **HILL** would arrive at the apartment complex, video images captured **HILL** open the hood of his grey Nissan Altima, retrieve a bag from underneath, and walk into Apartment #3 on multiple occasions. The only day **HILL** did not retrieve anything from under the hood was on February 9, 2023, which was his birthday. **HILL** would spend anywhere between fifteen (15) minutes to four (4) hours inside of Apartment #3. Video surveillance captured multiple people going in and out of the apartment carrying money and twisting up plastic baggies which is consistent with drug trafficking. On multiple occasions video surveillance has captured people leaving Apartment #3 after **HILL** had arrived and the people conducting drug transactions outside of the entry door. Video surveillance has captured multiple people walking into the unit with firearms that are not concealed. When **HILL** would leave Apartment #3, he would open the hood of his vehicle and place the bag underneath before leaving the parking lot.

38. On February 13, 2023, at approximately 1004 hours, I was monitoring the surveillance videos at 3508 Independence Avenue, Apt. #3. I observed a black male who was wearing black jeans and a tan/crème colored hoodie exit Apartment #3 carrying a black trash bag that appeared to be full. I observed the male walk to the trash dumpster located in the back parking lot of the apartment complex. The male dropped the black trash bag next to the trash dumpster instead of inside of the trash dumpster. I observed the male walk south bound and away from the trash. I continued to watch the surveillance videos of the black trash bag that was lying next to the dumpster until we were able to get detectives in the area. Det. Crump and I responded to the

location and recovered the black trash bag that was lying next to the dumpster. We responded to a secure police facility with the trash. Det. Wells and I assisted in sorting through the items in the trash retrieved from 3508 Independence Avenue, Apt. #3, Kansas City, Missouri. The following items were then recovered from the trash:

- a. Seven (7) torn plastic baggies with residue;
- b. One (1) hypodermic needle #1 containing a red and clear liquid;
- c. One (1) hypodermic needle #2 containing a red and clear liquid;
- d. One (1) custom made glass pipe with residue;
- e. One debit card with the name “Danny Ramsey” imprinted on the back;
- f. A torn yellow piece of paper with “Troy, 816-686-1485, 816-439-9363, 816-439-7365, 432- 30” handwritten on the front and back.

39. Forensic Specialist II Melissa Steinke with the Drug Trafficking Squad tested the hypodermic needle #1 and #2 with the MX908. The test indicated the presence of methamphetamine, a schedule II controlled substance in needle #1 and fentanyl compound, a schedule II controlled substance, in needle #2.

40. On February 23, 2023, at 1531 hours, I obtained a federal search warrant for the 1301 Topping Avenue residence from the Honorable Jill A. Morris, United States Magistrate Judge.

41. On March 2, 2023, surveillance showed **HILL** arrive at the Ameristar Casino located at 3200 North Ameristar Drive, Kansas City, Missouri, at 0039 hours. **HILL** was contacted and placed under arrest for the drug trafficking investigation at 0150 hours. At the time **HILL** was taken into custody, he had two cellular telephones on his person. He was carrying **Target Device 1**. **Target Device 1** was a black TCL cellular telephone with IMEI number 016033001912917

imprinted on the phone. **Target Device 1** also had a black and blue protection case. In **HILL**'s pocket was **Target Device 2**. **Target Device 2** was a black SCHOK cellular flip telephone. I took possession of **Target Devices 1** and **2**, transported them to our secure facility, and recovered them as evidence.

42. On March 2, 2023, at approximately 0330 hours, surveillance detectives who were watching the 1301 Topping Avenue residence observed a silver Kia Optima back into the driveway. Detectives observed **KING** exit the front entry door carrying a child. Detectives observed **KING** place the child in the back seat as she entered the front passenger's seat. Detectives stated the vehicle left the driveway of the residence and drove north bound on Topping Avenue. The Tactical Response Team conducted a car check in the area of E. 12th Street and Colorado Avenue, Kansas City, Missouri. Officers identified the passenger to be **Patricia A. KING**. **KING** was arrested for the drug trafficking investigation.

43. At the time **KING** was taken into custody, she had two cellular phones on her person. **KING**'s phones will be hereinafter labeled as **Target Device 3** and **Target Device 4**. **Target Device 3** was a blue ONEPLUS cellular telephone with IMEI number 990016801970268 imprinted on the phone. **Target Device 4** was an iPhone cellular telephone with a multi-colored case. Det. Wells took possession of **Target Devices 3** and **4**, transported them to our secure facility, and recovered them as evidence.

44. The search warrant for 1301 Topping Avenue was executed at 0652 hours. After the Tactical Response Team cleared the residence, it was determined the home had two bedrooms. The northeast bedroom appeared to be the room that **HILL** and **KING** were sharing. It had both of their clothing in it as well as numerous documents and credit/debit cards with their names on

them. There was mail addressed to 1301 Topping Ave. for both **HILL** and **KING**. The southeast bedroom appeared to be used by the child.

45. In **HILL** and **KING**'s bedroom, they shared a closet with both male and female clothing hanging in it. On the floor of the closet was a small black zippered bag. In the bag were three vacuumed sealed bags of methamphetamine, weighing approximately 3.1 pounds. On the shelf of the closet was a 50-round capacity, 9mm drum magazine, with a receipt showing it had been purchased on February 25, 2023, from a local pawn shop. Also on the closet shelf was a Promag 9mm pistol magazine with an unknown round capacity. One live 9mm round, stamped WIN 9mm Luger, was with the magazine. On the same shelf was a zippered pouch that contained a digital scale. The scale had residue on it consistent with methamphetamine.

46. The dresser in the northeast bedroom appeared to be shared by **HILL** and **KING**. In the top right drawer, was women's underwear and bras. In that same drawer was a piece of mail addressed to **KING** at 1301 Topping Avenue. Also in that drawer was a Cobra, model CB38, .38 caliber pistol, with serial number CT115158. It was loaded with two rounds of ammunition stamped FEDERAL 38 SPL+P. There were two pistol magazines in the drawer as well. A Glock .40 caliber magazine, with a 15 round capacity and a SGM Tactical 9mm magazine, with a 31-round capacity. In the left side middle drawer, was men's underwear and undershirts. In that same drawer was a vacuum sealed bag of apparent methamphetamine, weighing approximately 1.1 pounds. The bag of methamphetamine had been cut open. In the drawer with the methamphetamine was a Bally's casino card bearing **HILL**'s name.

47. In the same northeast bedroom, tucked in between the mattress and box spring was a 9mm, HS Produkt model Hellcat, with serial BA159905. The grip of the pistol was protruding

from the mattress for easy access. The pistol was loaded with 13 rounds of 9mm ammunition, including one in the chamber.

48. Under the bed box springs was a Timberland shoe box. In the shoe box was a Tupperware container that contained approximately one (1) pound of apparent methamphetamine. The methamphetamine was divided amongst four plastic bags.

49. In a smaller dresser, adjacent to the bed, was an approximately 10 ml bottle of apparent PCP. It was half full. There were also 53 empty vials that had not yet been used. They were the same vials used to hold PCP.

50. In the kitchen cabinet, located above the refrigerator, was a black zippered bag. Detectives recognized the bag as the same bag **HILL** had been previously seen placing under the hood of the Nissan Altima on several occasions. Inside the bag was approximately 60 grams of methamphetamine, divided into three plastic bags. There were also two vials of apparent PCP as well as an opened package of ~~Moore~~ ^{More} cigarettes in the bag. The vials were approximately 20-30 ml vials. One vial was full, and the second vial was one-third full. A HS Produkt, model XD-9 sub-compact, 9mm pistol with serial BA232742 was in the bag as well. The pistol was loaded with 11 rounds of 9mm ammunition, including one in the chamber. The pistol was reported stolen on October 4, 2021.

51. Forensic Specialist II Michelle Nordyke utilized the TruNarc test to confirm the apparent methamphetamine, from all four different locations, tested positive for methamphetamine. She also tested the apparent PCP utilizing the Nik Reagent Kit and confirmed it was positive for PCP.

52. A check of **HILL**'s criminal history revealed a lengthy drug and weapon history. **HILL** had arrests for felony possession of a controlled substance in 1997, twice in 1999, 2001,

2002 and 2012. He had arrests for distribution of a controlled substance in 2005, 2010 and 2011. He was arrested for felony firearm charges in 1999, 2000, 2002 and 2016. On or about March 15, 2000, **HILL** pled guilty to Possession of a Controlled Substance, Cocaine Base, a class C felony, in the Circuit Court of Jackson County, Missouri, in Case Number 16CR99006351-01, and was ultimately sentenced to 3 years in the Missouri Department of Adult Institutions, pursuant to § 559.115, RSMo., on or about July 27, 2001. On or about October 10, 2002, **HILL** was found guilty of Tampering in the First Degree, a class C felony, in the Circuit Court of Platte County, Missouri, in Case Number 02CR83918-01, and was sentenced to 4 years in the Missouri Department of Adult Institutions on or about November 21, 2002. On or about September 08, 2004, **HILL** pled guilty to Tampering in the First Degree, a class C felony, in the Circuit Court of Jackson County, Missouri, in Case Number 16CR02004611-01, and was sentenced to 3 years in the Missouri Department of Adult Institutions, suspended, and was placed on 5 years' probation. On or about September 08, 2004, **HILL** pled guilty to Tampering in the First Degree, a class C felony, in the Circuit Court of Jackson County, Missouri, in Case Number 16CR02008254-01, and was sentenced to 3 years in the Missouri Department of Adult Institutions, suspended, and was placed on 5 years' probation, concurrent with Case Number 16CR02004611-01. On or about July 29, 2005, **HILL** pled guilty to Distribution/Delivery/Manufacture of a Controlled Substance, a class B felony, in the Circuit Court of Clay County, Missouri, in Case No. 7CR105002160, and was sentenced to 12 years in the Missouri Department of Adult Institutions on or about September 15, 2005.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

53. Based on the aforementioned facts, I believe that **HILL's** two phones (**Target Device 1** and **2**) and **KING's** two phones (**Target Device 3** and **4**) contain information that will

help identify sources of supply of controlled substances as well as other co-conspirators. I know that drug traffickers often refer to other co-conspirators by first name only or by nickname and store such information in the electronic phone book of the mobile phones. I know that retrieving names and the respective phone numbers associated with them, would assist in further identifying sources of supply and co-conspirators that would be difficult or nearly impossible to identify without direct knowledge of these individuals. I know that the latest trend in drug trafficking is to use pre-paid mobile phones that require little or no personal information to activate, therefore the effectiveness of administrative subpoenas on respective mobile phone companies is limited when individuals do not provide personal information. I know that traffickers utilize mobile phones equipped with digital cameras and use such devices to photograph controlled substances and proceeds from the sale of controlled substances. I know that drug traffickers photograph themselves with other co-conspirators and many times photograph themselves. I know that drug traffickers will also photograph their firearms used to protect their controlled substances and their proceeds obtained from the sale of controlled substances.

CONCLUSION

54. For the foregoing reasons, I respectfully submit that there is probable cause to believe that the **Target Devices** presently contain or constitute evidence of 21 U.S.C. § 841(a)(1), (b)(1)(A) and 846, conspiracy to distribute a controlled substance, 21 U.S.C. § 841(a)(1), (b)(1)(A) and 18 U.S.C. § 2, possession with intent to distribute 500 grams or more of methamphetamine, 21 U.S.C. § 841(a)(1), (b)(1)(C), and 18 U.S.C. § 2, possession with intent to distribute PCP, 18 U.S.C. §§ 924(c)(1)(A)(i) and 2, possession of firearms in furtherance of a drug trafficking crime, and 18 U.S.C. §§ 922(g)(1) and 924(a)(8), felon in possession of firearms. I therefore request

warrants to search the **Target Devices** described in Attachments A1–A4 for the items set forth in Attachment B.

Respectfully submitted,

David Middleton Jr
David Middleton
Detective
Kansas City, Missouri, Police Department

Subscribed to and sworn before me via reliable electronic means on 20th day of March 2023.

Sworn to by telephone

10:20 AM, Mar 20, 2023

Lajuana M. Counts
Honorable Lajuana M. Counts
United States Magistrate Judge
Western District of Missouri

